

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**Case No. 1:25-cv-22896-KMW**

FRIENDS OF THE EVERGLADES, INC., a Florida not-for-profit corporation, and CENTER FOR BIOLOGICAL DIVERSITY, a 501(c)(3) nonprofit organization,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as Secretary of the UNITED STATES DEPARTMENT OF HOMELAND SECURITY; TODD LYONS, in his official capacity as Acting Director of the UNITED STATES IMMIGRATION AND CUSTOMS ENFORCEMENT; KEVIN GUTHRIE, in his official capacity as Executive Director of the Florida Division of Emergency Management; and MIAMI-DADE COUNTY, a political subdivision of the State of Florida,

Defendants.

and

THE MICCOSUKEE TRIBE OF INDIANS,

Proposed Intervenors.

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**PLAINTIFFS' EXPEDITED REQUEST FOR PRODUCTION  
TO FEDERAL DEFENDANTS**

Pursuant to Fed. R. Civ. P. 34, Plaintiffs Friends of the Everglades, Inc., and Center for Biological Diversity (collectively, "Plaintiffs"), through undersigned counsel, hereby request that the following documents be produced for inspection and copying by Defendants Kristi Noem, in her official capacity as Secretary of the United States Department of Homeland Security and Todd

Lyons, in his official capacity as Acting Director of the United States Immigration And Customs Enforcement, within seven (7) days.

**REQUESTS FOR DOCUMENTS**

1. Any agreements between Immigration and Customs Enforcement (“ICE”), the U.S. Department of Homeland Security (“DHS”), FEMA, or both, and the Florida Division of Emergency Management (“FDEM”), or any other state or local government office, pursuant to section 287(g) or any other provision of the Immigration and Nationality Act, applicable to the use of the Dade-Collier Training and Transition Airport (“TNT site”) as a detention center.
2. A copy of any Intergovernmental Service Agreements (“IGSA”), Memorandum of Understanding, or the like, among FDEM and ICE or DHS or FEMA related to the TNT site.
3. Communications between FEMA, and ICE and/or DHS and FDEM or any other State of Florida official or employee relating to the use of the TNT site as a detention center.
4. A copy of any IGSA between ICE and any other state or local government office related to the TNT site.
5. A copy of any Basic Ordering Agreements (“BOA”) between ICE and FDEM.
6. A copy of any BOAs between ICE and any other state or local government office.
7. Communications between FDEM and Miami-Dade County pertaining to FDEM’s Letter of Intent (“LOI”) in connection with the proposed acquisition of the Dade-Collier Training and Transition Airport (“TNT”) and/or in connection with FDEM’s utilization of the TNT Site.
8. All documents pertaining to or discussing the environmental impacts of any use of the TNT site as an immigrant detention center.
9. All documents pertaining to or discussing the impacts on any listed endangered species or critical habitat resulting from FDEM’s use of the TNT site.
10. All documents pertaining to or demonstrating any water, power, traffic planning, incineration, sewer and sewage disposal, wetlands mitigation, or related infrastructure plans relating to the use of the TNT site as a detention center.

Respectfully submitted,

EARTHJUSTICE  
4500 Biscayne Boulevard, Suite 201  
Miami, Florida 33137  
Telephone: (305) 440-5432

By: \_\_\_\_\_ s/ Tania Galloni  
Tania Galloni, Fla. Bar No. 619221  
[tgallo@earthjustice.org](mailto:tgallo@earthjustice.org)  
Dominique Burkhardt, Fla. Bar No.  
100309  
[dburkhardt@earthjustice.org](mailto:dburkhardt@earthjustice.org)  
Alisa Coe, Fla. Bar No. 10187  
[aco@earthjustice.org](mailto:aco@earthjustice.org)

*Counsel for Friends of the Everglades*

CENTER FOR BIOLOGICAL DIVERSITY  
Elise Pautler Bennett, Fla. Bar No. 106573  
[ebennett@biologicaldiversity.org](mailto:ebennett@biologicaldiversity.org)  
Jason Alexander Totoiu, Fla. Bar No. 871931  
[jtotoiu@biologicaldiversity.org](mailto:jtotoiu@biologicaldiversity.org)  
Post Office Box 2155  
St. Petersburg, FL 33731  
Telephone: (727) 755-6950

*Counsel for Center for Biological Diversity*

COFFEY BURLINGTON, P.L.  
2601 South Bayshore Drive, Penthouse One  
Miami, Florida 33133  
Telephone: (305) 858-2900

By: \_\_\_\_\_ s/ Paul J. Schwiep  
Paul J. Schwiep, Fla. Bar No. 823244  
[PSchwiep@CoffeyBurlington.com](mailto:PSchwiep@CoffeyBurlington.com)  
Scott Hiaasen, Fla. Bar No. 103318  
[SHiaasen@CoffeyBurlington.com](mailto:SHiaasen@CoffeyBurlington.com)  
[YVB@CoffeyBurlington.com](mailto:YVB@CoffeyBurlington.com)  
[LPerez@CoffeyBurlington.com](mailto:LPerez@CoffeyBurlington.com)  
[service@CoffeyBurlington.com](mailto:service@CoffeyBurlington.com)

*Counsel for Plaintiffs*

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on July 23, 2025, I served the foregoing document via Electronic Mail on all counsel of record identified below.

\_\_\_\_\_ s/ Paul J. Schwiep

Service List	
<p><b>Nathan A. Forrester</b>  Chief Deputy Solicitor General  <a href="mailto:nathan.forrester@myfloridalegal.com">nathan.forrester@myfloridalegal.com</a></p> <p><b>Robert S. Schenck</b>  Assistant Solicitor General  <a href="mailto:robert.schenck@myfloridalegal.com">robert.schenck@myfloridalegal.com</a>  Office of the Attorney General  The Capitol, PL-01  Tallahassee, Florida 32399-1050  Telephone: (850) 414-3300  <a href="mailto:jenna.hodges@myfloridalegal.com">jenna.hodges@myfloridalegal.com</a></p> <hr/> <p>BOIES SCHILLER FLEXNER LLP  <b>Jesse Panuccio, Esq.</b>  <a href="mailto:ipanuccio@bsflp.com">ipanuccio@bsflp.com</a>  <b>Evan Ezray, Esq.</b>  <a href="mailto:eezray@bsflp.com">eezray@bsflp.com</a>  401 East Las Olas Boulevard, Suite 1200  Fort Lauderdale, Florida 33301  Telephone: (954) 356-0011</p> <p><i>Counsel for Defendant Kevin Guthrie, in his official capacity as Executive Director of the Florida Division of Emergency Management</i></p>	<p>HAYDEN P. O'BYRNE  United States Attorney  <b>Carlos J. Raurell</b>  Assistant U.S. Attorney  <a href="mailto:carlos.raurell@usdoj.gov">carlos.raurell@usdoj.gov</a>  99 Northeast 4<sup>th</sup> Street  Miami, Florida 33132  Telephone: (305) 961-9243  <a href="mailto:melissa.Jiminson@usdoj.gov">melissa.Jiminson@usdoj.gov</a></p> <hr/> <p>ADAM R.F. GUSTAFSON  Acting Assistant Attorney General  Environment and Natural Resources Division  United States Department of Justice  <b>Peter M. Torstensen, Jr.</b>  Deputy Assistant Attorney General  Environment and Natural Resources Division  United States Department of Justice  <b>Hayley A. Carpenter</b>  Trial Attorney  <a href="mailto:hayley.carpenter@usdoj.gov">hayley.carpenter@usdoj.gov</a>  Natural Resources Section  Ben Franklin Station  P.O. Box 7611  Washington, D.C. 20044-7611  Telephone: (202) 305-0242</p> <p><i>Counsel for Kristi Noem, in her official capacity as Secretary, United States Department of Homeland Security, and Todd Lyons, in his official capacity as Acting Director, United States Immigration and Customs Enforcement</i></p>
<p>GERALDINE BONZON-KEENAN  Miami-Dade County Attorney  <b>Christopher J. Wahl</b>  Assistant County Attorney  <a href="mailto:wahl@miamidade.gov">wahl@miamidade.gov</a></p> <p><b>Monica Rizo Perez</b>  Assistant County Attorney  <a href="mailto:Monica.Rizo@miamidade.com">Monica.Rizo@miamidade.com</a></p> <p><b>David M. Murry</b>  Assistant County Attorney</p>	

<p><u>DMMurray@FlyMIA.com</u></p> <p>Stephen P. Clark County 111 Northwest 1<sup>st</sup> Street, Suite 2810 Miami, Florida 33128 Telephone: (305) 375-5151</p> <p><u>Victor.Rodriguez3@miamidade.gov</u> <u>Madalis.Gonzalez@miamidade.gov</u> <u>KGriffin@FlyMIA.com</u></p> <p><i>Counsel for Miami-Dade County</i></p>	
<p><b>Todd R. Friedman, Esq.</b> <u>todd@toddfriedmanpa.com</u></p> <p>TODD R. FRIEDMAN, P.A. 1101 Brickell Avenue Suite S-700 Miami, Florida 33131 Telephone: (786) 536-7190</p> <p><i>Counsel for The Miccosukee Tribe of Indians</i></p>	